

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

CBRE REALTY FINANCE TRS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 08-cv-1964
)	
BRIAN A. McCORMICK)	
)	
and)	
)	
CHARLES W. MOORE,)	
)	
Defendants.)	

DEFENDANTS' EMERGENCY MOTION EXTEND DISCOVERY DEADLINE

COME NOW, the Defendants Brian A. McCormick and Charles W. Moore (hereinafter collectively "Defendants") and move this Court for an extending the deadline to complete fact discovery for a period of at least 60 days from July 7, 2009. In support of such motion, the Defendants incorporate the memorandum in support herein by reference.

Emergency or expedited treatment is requested in light of the fact that the current discovery deadline is set for July 7, 2009.

WHEREFORE, the Defendants respectfully request that the Court enter an order:

1. Extending the deadline for the conclusion of fact discovery by a period of at least 60 days from July 7, 2009; and

2. Granting such further relief as the Court deems just.

BRIAN A. McCORMICK
and CHARLES W. MOORE,

By their attorneys,

/s/ Ryan D. Sullivan

Joseph S.U. Bodoff (D. Md. Bar No. 92160)

Ryan D. Sullivan (D. Md. Bar No. 16382)

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Dated: June 19, 2009

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 104(7)

I, Ryan D. Sullivan hereby certify that prior to filing the instant Motion of the Defendants to Clarify Extend Discovery Deadline, I sent an e-mail on June 18, 2009 to counsel for the Plaintiff, George R. Calhoun V, requesting that the Plaintiff's agree to an extension of the Discovery Deadline in a good faith effort to resolve this dispute. Attorney Calhoun stated to Joseph S.U. Bodoff that the Plaintiff's would not agree to such an extension.

/s/Ryan D. Sullivan